



THE CITY OF NEW YORK
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April 1, 2025

By ECF

Honorable Jessica G. L. Clarke
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York, 10007

Re: Saunders v. City of New York, et al.,
24 Civ. 00910 (JGLC)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and assigned to the defense of the above referenced matter. Defendant writes in accordance with the Court's March 12, 2025 Order, to provide a status update regarding the Department of Correction ("DOC") video footage. (ECF Dkt. 24).

By way of background, on March 11, 2025, the parties filed a request to extend time to complete discovery. (See ECF Dkt. 23). In the March 11th submission, the parties discussed that upon review of the videos, the November 11, 2022 surveillance videos are not continuous. Id. Representatives from DOC have reached out to members of the Special Investigation Unit and confirmed that the copy of the video in their possession are the same as those already produced. As a result, the City has not produced additional video footage to Plaintiff's counsel.

The City thanks the Court for its time and consideration herein.

Respectfully submitted,

/s/

Joseph Zangrilli
Senior Counsel
Special Federal Litigation

Cc: **VIA ECF**
Attorneys for Plaintiff
Sara Wolkenstorfer, Esq.